

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**LIFE VAC, LLC,**

**Plaintiff,**

**vs.**

**PETER HEIMLICH,**

**Defendant.**

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**CASE NO.**

**1:23-cv-03368-MLB**

**ANSWER OF DEFENDANT PETER HEIMLICH**

COMES NOW Defendant Peter Heimlich, by and through the undersigned attorney, and files this Answer to Plaintiff's Complaint as follows:

**First Defense**

Plaintiff's Complaint fails to state a claim against the Defendant upon which relief can be granted.

**1.**

Defendant denies the allegations of Paragraph 1 of Plaintiff's Complaint.

**2.**

Defendant denies the allegations of Paragraph 2 of Plaintiff's Complaint.

**3.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 3 of Plaintiff's Complaint.

**4.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 4 of Plaintiff's Complaint.

**5.**

Defendant denies the allegations of Paragraph 5 of Plaintiff's Complaint.

**6.**

Defendant denies the allegations of Paragraph 6 of Plaintiff's Complaint.

**7.**

Defendant denies the allegations of Paragraph 7 of Plaintiff's Complaint.

**8.**

Defendant denies the allegations of Paragraph 8 of Plaintiff's Complaint.

**9.**

Defendant denies the allegations of Paragraph 9 of Plaintiff's Complaint.

**10.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 10 of Plaintiff's Complaint.

**11.**

Defendant admits the allegations of Paragraph 11 of Plaintiff's Complaint.

**12.**

Defendant admits the allegations of Paragraph 12 of Plaintiff's Complaint.

**13.**

Defendant admits the allegations of Paragraph 13 of Plaintiff's Complaint.

**14.**

Defendant admits the allegations of Paragraph 14 of Plaintiff's Complaint.

**15.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 15 of Plaintiff's Complaint.

**16.**

Defendant denies the allegations of Paragraph 16 of Plaintiff's Complaint.

**17.**

Defendant denies the allegations of Paragraph 17 of Plaintiff's Complaint.

**18.**

Defendant denies the allegations of Paragraph 18 of Plaintiff's Complaint.

**19.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 19 of Plaintiff's Complaint.

**20.**

Defendant denies the allegations of Paragraph 20 of Plaintiff's Complaint.

**21.**

Defendant is without knowledge sufficient to either admit or deny the

allegations contained in Paragraph 21 of Plaintiff's Complaint.

**22.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 22 of Plaintiff's Complaint.

**23.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 23 of Plaintiff's Complaint.

**24.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 24 of Plaintiff's Complaint.

**25.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 25 of Plaintiff's Complaint.

**26.**

Defendant denies the allegations of Paragraph 26 of Plaintiff's Complaint.

**27.**

Defendant denies the allegations of Paragraph 27 of Plaintiff's Complaint.

**28.**

Defendant denies the allegations of Paragraph 28 of Plaintiff's Complaint.

**29.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 29 of Plaintiff's Complaint.

**30.**

Defendant denies the allegations of Paragraph 30 of Plaintiff's Complaint.

**31.**

Defendant denies the allegations of Paragraph 31 of Plaintiff's Complaint.

**32.**

Defendant denies the allegations of Paragraph 32 of Plaintiff's Complaint.

**33.**

Defendant denies the allegations of Paragraph 33 of Plaintiff's Complaint.

**34.**

Defendant admits the allegations of Paragraph 34 of Plaintiff's Complaint.

**35.**

Defendant denies the allegations of Paragraph 35 of Plaintiff's Complaint.

**36.**

Defendant denies the allegations of Paragraph 36 of Plaintiff's Complaint.

**37.**

Defendant denies the allegations of Paragraph 37 of Plaintiff's Complaint.

**38.**

Defendant denies the allegations of Paragraph 38 of Plaintiff's Complaint.

**39.**

Defendant denies the allegations of Paragraph 39 of Plaintiff's Complaint.

**40.**

Defendant denies the allegations of Paragraph 40 of Plaintiff's Complaint.

**41.**

Defendant denies the allegations of Paragraph 41 of Plaintiff's Complaint.

**42.**

Defendant denies the allegations of Paragraph 42 of Plaintiff's Complaint.

**43.**

Defendant denies the allegations of Paragraph 43 of Plaintiff's Complaint.

**44.**

Defendant denies the allegations of Paragraph 44 of Plaintiff's Complaint.

**45.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 45 of Plaintiff's Complaint.

**46.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 46 of Plaintiff's Complaint.

**47.**

Defendant denies the allegations of Paragraph 47 of Plaintiff's Complaint.

**48.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 48 of Plaintiff's Complaint.

**49.**

Defendant denies the allegations of Paragraph 49 of Plaintiff's Complaint.

**50.**

Defendant denies the allegations of Paragraph 50 of Plaintiff's Complaint.

**51.**

Defendant denies the allegations of Paragraph 51 of Plaintiff's Complaint.

**52.**

Defendant admits the allegations of Paragraph 52 of Plaintiff's Complaint.

**53.**

Defendant denies the allegations of Paragraph 53 of Plaintiff's Complaint.

**54.**

Defendant denies the allegations of Paragraph 54 of Plaintiff's Complaint.

**55.**

Defendant admits the allegations of Paragraph 55 of Plaintiff's Complaint.

**56.**

Defendant denies the allegations of Paragraph 56 of Plaintiff's Complaint.

**57.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 57 of Plaintiff's Complaint.

**58.**

Defendant denies the allegations of Paragraph 58 of Plaintiff's Complaint.

**59.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 59 of Plaintiff's Complaint.

**60.**

Defendant denies the allegations of Paragraph 60 of Plaintiff's Complaint.

**61.**

Defendant denies the allegations of Paragraph 61 of Plaintiff's Complaint.

**62.**

Defendant denies the allegations of Paragraph 62 of Plaintiff's Complaint.

**63.**

Defendant denies the allegations of Paragraph 63 of Plaintiff's Complaint.

**64.**

Defendant denies the allegations of Paragraph 64 of Plaintiff's Complaint.



**65.**

Defendant denies the allegations of Paragraph 65 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 66 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 67 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 68 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 69 of Plaintiff's Complaint.

**70.**

Defendant denies the allegations of Paragraph 70 of Plaintiff's Complaint.

**71.**

Defendant denies the allegations of Paragraph 71 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 72 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 73 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 76 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 77 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 78 of Plaintiff's Complaint.

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Defendant denies the allegations of Paragraph 79 of Plaintiff's Complaint.

**80.**

Defendant denies the allegations of Paragraph 80 of Plaintiff's Complaint.

**81.**

Defendant denies the allegations of Paragraph 81 of Plaintiff's Complaint.

**82.**

Defendant denies the allegations of Paragraph 82 of Plaintiff's Complaint.

**83.**

Defendant denies the allegations of Paragraph 83 of Plaintiff's Complaint.

**84.**

Defendant denies the allegations of Paragraph 84 of Plaintiff's Complaint.

**85.**

Defendant denies the allegations of Paragraph 85 of Plaintiff's Complaint.

**86.**

Defendant denies the allegations of Paragraph 86 of Plaintiff's Complaint.

**87.**

Defendant denies the allegations of Paragraph 87 of Plaintiff's Complaint.

**88.**

Defendant denies the allegations of Paragraph 88 of Plaintiff's Complaint.

**89.**

Defendant denies the allegations of Paragraph 89 of Plaintiff's Complaint.

**90.**

Defendant denies the allegations of Paragraph 90 of Plaintiff's Complaint.

**91.**

Defendant denies the allegations of Paragraph 91 of Plaintiff's Complaint.

**92.**

Defendant denies the allegations of Paragraph 92 of Plaintiff's Complaint.

**93.**

Defendant denies the allegations of Paragraph 93 of Plaintiff's Complaint.

**94.**

Defendant denies the allegations of Paragraph 94 of Plaintiff's Complaint.

**95.**

Defendant denies the allegations of Paragraph 95 of Plaintiff's Complaint.

**96.**

Defendant denies the allegations of Paragraph 96 of Plaintiff's Complaint.

**97.**

Defendant denies the allegations of Paragraph 97 of Plaintiff's Complaint.

**98.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 98 of Plaintiff's Complaint.

**99.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 99 of Plaintiff's Complaint.

**100.**

Defendant admits the allegations of Paragraph 100 of Plaintiff's Complaint.

**101.**

Defendant admits the allegations of Paragraph 101 of Plaintiff's Complaint.

**102.**

Defendant admits the allegations of Paragraph 102 of Plaintiff's Complaint.

**103.**

Defendant denies the allegations of Paragraph 103 of Plaintiff's Complaint.

**104.**

Defendant denies the allegations of Paragraph 104 of Plaintiff's Complaint.

**105.**

Defendant denies the allegations of Paragraph 105 of Plaintiff's Complaint.

**106.**

Defendant denies the allegations of Paragraph 106 of Plaintiff's Complaint.

**107.**

Defendant denies the allegations of Paragraph 107 of Plaintiff's Complaint.

**108.**

Defendant denies the allegations of Paragraph 108 of Plaintiff's Complaint.

**109.**

Defendant denies the allegations of Paragraph 109 of Plaintiff's Complaint.

**110.**

Defendant denies the allegations of Paragraph 110 of Plaintiff's Complaint.

**111.**

Defendant denies the allegations of Paragraph 111 of Plaintiff's Complaint.

**112.**

Defendant admits the allegations of Paragraph 112 of Plaintiff's Complaint.

**113.**

Defendant denies the allegations of Paragraph 113 of Plaintiff's Complaint.

**114.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 114 of Plaintiff's Complaint.

**115.**

Defendant denies the allegations of Paragraph 115 of Plaintiff's Complaint.

**116.**

Defendant denies the allegations of Paragraph 116 of Plaintiff's Complaint.

**117.**

Defendant denies the allegations of Paragraph 117 of Plaintiff's Complaint.

**118.**

Defendant denies the allegations of Paragraph 118 of Plaintiff's Complaint.

**119.**

Defendant denies the allegations of Paragraph 119 of Plaintiff's Complaint.

**120.**

Defendant denies the allegations of Paragraph 120 of Plaintiff's Complaint.

**121.**

Defendant denies the allegations of Paragraph 121 of Plaintiff's Complaint.

**122.**

Defendant denies the allegations of Paragraph 122 of Plaintiff's Complaint.

**123.**

Defendant denies the allegations of Paragraph 123 of Plaintiff's Complaint.

**124.**

Defendant admits the allegations of Paragraph 124 of Plaintiff's Complaint.

**125.**

Defendant denies the allegations of Paragraph 125 of Plaintiff's Complaint.

**126.**

Defendant is without knowledge sufficient to either admit or deny the allegations contained in Paragraph 126 of Plaintiff's Complaint.

**127.**

Defendant denies the allegations of Paragraph 127 of Plaintiff's Complaint.

**128.**

Defendant denies the allegations of Paragraph 128 of Plaintiff's Complaint.

**129.**

Defendant denies the allegations of Paragraph 129 of Plaintiff's Complaint.

**130.**

Defendant denies the allegations of Paragraph 130 of Plaintiff's Complaint.

**131.**

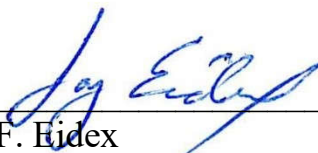
The Defendant hereby denies all other allegations contained in Plaintiff's complaint not otherwise admitted or denied herein.

WHEREFORE, Defendant Peter Heimlich prays:

- a) For six months to complete discovery;
- b) For a trial by jury; and
- c) For such other and further relief that the Court deems just and proper.

Respectfully submitted this 23<sup>rd</sup> day of October, 2023

GROTH, MAKARENKO, KAISER  
& EIDEX



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Jay F. Eidex  
GA Bar No. 242397  
Attorney for Defendant

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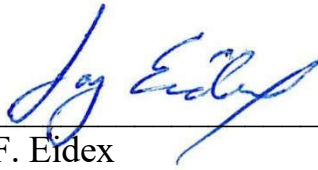


**CERTIFICATE OF COMPLIANCE WITH L.R. 5.1**

The undersigned attests that this document was prepared in Times New Roman, 14-point font that complies with this Court's Rules.

Respectfully submitted this 23<sup>rd</sup> day of October, 2023.

GROTH, MAKARENKO, KAISER & EIDEX



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Jay F. Eidex

Georgia Bar No. 242397

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**CASE NO.**

**1:23-cv-03368-MLB**

**CERTIFICATE OF SERVICE**

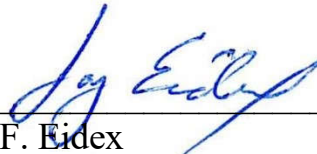
This is to certify that I have this day electronically filed **ANSWER OF DEFENDANT PETER HEIMLICH** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notifications of such filing to the following attorneys of record:

Sean Keenan, Esq.  
Ashley Landers, Esq.  
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Respectfully submitted this 23<sup>rd</sup> day of October, 2023.

GROTH, MAKARENKO, KAISER  
& EIDEX



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